

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON-SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

KARISSA MASON,

Defendant.

No. CR19-203 RSM

DEFENDANT'S MEMORANDUM  
REGARDING VIOLATIONS OF  
SUPERVISED RELEASE

Karissa Mason, by and through her attorney, submits this memorandum regarding violations of supervised release.

Ms. Mason is admitting Violations 1, 3 and 5. She is denying violations 2 and 4 – which involve knowingly using fentanyl. She is not challenging the accuracy of the urinalysis that shows fentanyl was in her system, but it was unwittingly ingested, most likely as a mixed in component of what she believed was methamphetamine.

The defense is asking the Court to not impose immediate incarceration, but to set over sentencing on the alleged violations to a new date in 60 days and order that Ms. Mason must enter in-patient treatment no later than April 26, 2024.

Ms. Mason is willing to go to treatment. But she needs to be on an acceptable dosage level of methadone in order to be accepted into detox – a necessary step before inpatient.

1 Providence Hospital would not take her because her dosage level is too low to be considered  
2 “stable.” She was provided, by U.S. Probation with a detox facility, Recovery Place on  
3 Seattle, that will apparently accept someone on the low level of methadone she is at currently.  
4 That facility referred her to a physician for screening that is scheduled to take place on March  
5 29, 2024, at 3 p.m.

6 The defense request is also made based upon the letter attached to this memorandum  
7 as Appendix A. It is a letter given to Ms. Mason by her treatment provider, Therapeutic  
8 Health Services. It describes how a breakdown in their computer system led to delays in  
9 being able to get Ms. Mason into detox, the step before entering in-patient treatment. The  
10 letter states that she had been trying to make that arrangement for some time.

11 The letter also notes that Ms. Mason has now been connected with mental health  
12 treatment, and once again been prescribed Adderall. Adderall is a medications that has been  
13 very effective in treating Ms. Mason’s Attention Deficit Disorder. She had historically been  
14 prescribed Adderall and had renewed that prescription after she was released from prison.  
15 U.S. Probation contacted her physician to ask why she was being prescribed a stimulant like  
16 Adderall, and she was switched to a different dose and eventually stopped seeing that  
17 physician. Getting reconnected with a mental health provider is an important part of  
18 addressing Ms. Mason’s entire health situation, beyond just her chemical dependency.  
19

### 20 **Conclusion**

21 The goal for everyone in this case is for Ms. Mason to be able to stop the use of illegal  
22 drugs, while also maintaining her job, her relationship with her daughter, and her health. The  
23 most effective way to accomplish that will not be to place her in custody for 60 days now and  
24  
25

1 cause such a disruption in her life that she is left without a job, which is her lifeline when it  
2 comes to rent, child support, and daily living.

3 DATED this 27th day of March, 2024.

4 Respectfully submitted,

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6  
7 s/Jeffrey L. Kradel  
8 WSBA No. 26767  
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15  
16 CERTIFICATE OF SERVICE

17 I hereby certify that on March 27, 2024, I electronically filed the foregoing with the  
18 Clerk of the Court using the CM/ECF system which will send notification of such filing to the  
19 following:

20 AUSA Andrew Colasurdo

21 /s Jeffrey Kradel  
22  
23  
24  
25